

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

**LONNIE HAMPTON,**

**Plaintiff,**

v.

**THE RAYMOND CORPORATION,**

**Defendant.**

**CIVIL ACTION  
FILE NO. 1:18-CV-00081-RWS**

**PLAINTIFF'S DISCLOSURE OF JOHN CHAO, M.D. AS A NOT RETAINED  
OR SPECIALLY EMPLOYED FOR LITIGATION EXPERT**

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(C), Plaintiff discloses the following as a non-retained expert, the subject matter on which he is expected to present evidence, and a summary of the facts and opinions to which he is expected to testify.

**NAME AND BUSINESS ADDRESS:**

John Chao, MD  
Peachtree Orthopedics  
5505 Peachtree Dunwoody Rd  
Suite 600  
Atlanta, GA 30342  
404-355-0743

**SUBJECT MATTER AND SUMMARY OF FACTS AND OPINIONS TO WHICH THE EXPERT IS EXPECTED TO TESTIFY:**

Dr. Chao is an orthopedic surgeon who treated Plaintiff and provided follow up care after his injury.

Dr. Chao will be expected to testify based upon his observation and professional evaluation of the Plaintiff and the facts contained in his medical records, which have been produced to the Defendant and are incorporated by reference and made a part of this disclosure. He is expected to testify as to the nature and extent of Plaintiff's injuries, the causation of Plaintiff's injuries, his prognosis, and the limitations faced by Plaintiff after incurring the injuries, during his recovery and into the future. He is expected to testify that Plaintiff's injuries were caused by the subject incident and were those injuries which are described in the medical records produced to the Defendant and incorporated herein. He is expected to testify that these injuries caused Plaintiff pain and interfered with his ability to perform his job and activities of daily life.

**EXHIBITS THAT MIGHT BE USED WITH THIS WITNESS:**

It is expected that this witness will refer to his medical records and in particular the office notes. It is expected that radiographs will be used with this witness. It is expected that a medical illustration will be created and used with

this witness. It is possible, but less likely that medical bills will also be used with this witness.

**LIKELIHOOD THAT THIS WITNESS WILL BE CALLED BY PLAINTIFF:**

There is a medium probability that this expert will be called as a witness.

This 21<sup>st</sup> day of December, 2018.

Respectfully submitted,  
WARSHAUER LAW GROUP, P.C.

By: Michael J. Warshauer  
Michael Warshauer  
Georgia Bar No. 018720  
Trent Shuping  
Georgia Bar No. 159083

2740 Bert Adams Road  
Atlanta, GA 30339  
(404) 892-4900  
(404) 892-1020 Fax

MORGAN & MORGAN ATLANTA, PLLC

By: s/Christopher J. Graddock mjw  
Christopher J. Graddock  
Georgia Bar No. 304020  
Keenan R.S. Nix  
Georgia Bar No. 544855

Post Office Box 57007  
Atlanta, GA 30343-1007  
404-965-8811  
404-965-8812 Fax

**CERTIFICATE OF SERVICE AND COMPLIANCE WITH LOCAL RULE 5.1**

I hereby certify that the foregoing document was prepared in Book Antiqua 13 Point Font as allowed by Local Rule 5.1 and further certify that I have this day served a copy of the within and foregoing upon all parties to this matter via the CM/ECF system.

This 21<sup>st</sup> day of December, 2018.

By: Michael J. Warshauer

Warshauer Law Group, P.C.  
2740 Bert Adams Road  
Atlanta, GA 30339  
404-892-4900  
404-892-1020 Fax